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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL COOKSEY,

Defendant.

Case: 2:21-cr-20669

Judge: Murphy, Stephen J.

MJ: Stafford, Elizabeth A.

Filed: 11-03-2021 At 12:10 PM

INDI USA VS COOKSEY (DP)

VIOLATION: 18 U.S.C. § 1951

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. At all times relevant to this indictment, Jared the Galleria of Jewelry was a retail jewelry business, with multiple locations throughout the United States, that engaged in commercial activity that affects interstate commerce.

2. At all times relevant to this indictment, Kay Jewelers was a retail jewelry business, with multiple locations throughout the United States, that engaged in commercial activity that affects interstate commerce.

COUNT ONE

(18 U.S.C. § 1951 – Conspiracy to Commit Hobbs Act Robbery)

1. The General Allegations are incorporated into this count by reference.

2. From in and around October 2019 and continuing through in and around November 2019, in the Eastern District of Michigan and elsewhere, the defendant, MICHAEL COOKSEY, knowingly, intentionally, and unlawfully combined, conspired, confederated, and agreed with other individuals known and unknown to the grand jury, to obstruct, delay, and affect commerce by robbery of jewelry stores that engaged in commercial activity that affects interstate commerce, in violation of Title 18, United States Code, Section 1951.

FORFEITURE ALLEGATIONS

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture)

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offense of conviction. Such property includes, but is not limited to, a forfeiture money judgment against the defendant in an amount to be determined, representing the total value of all property subject to forfeiture.

3. Substitute Assets: If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

Saima S. Mohsin
Acting United States Attorney

s/Craig Wininger
Craig Wininger
Assistant United States Attorney
Chief, Violent and Organize Crime Unit

s/William M. Sloan
William M. Sloan
Assistant United States Attorney

Dated: November 3, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>hms</i>

Case Title: USA v. MICHAEL COOKSEY

County where offense occurred : Oakland

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.

☐ Indictment/___ Information --- based upon prior complaint [Case number:]

☐ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 3, 2021

Date

William M. Sloan

 William M. Sloan
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.